UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

SR- 6J

February 4, 2015

Mr. Chase Fortenberry
Georgia-Pacific LLC
133 Peachtree Street NE
Atlanta, GA 30303

RE: Quality Management Plan: Attachment 2 of the Multi-Area Quality Assurance Project Plan Revision 1, Addendum 1

Dear Mr. Fortenberry:

The U.S. Environmental Protection Agency (EPA) has completed its review of the Quality Management Plan (QMP), which is Attachment 2 of the Multi-Area Quality Assurance Project Plan (QAPP) Revision 1, Addendum 1. Although EPA approved the QAPP on January 27, 2015 there are comments on the QMP that need to be addressed.

EPA has enclosed the comments on the QMP that must be incorporated before resubmittal of the QAPP and related signature page.

Please contact me at (312) 886-0992 if you have any questions regarding this matter.

Sincerely,

James A. Saric
Remedial Project Manager
SFD Remedial Response Branch #1

cc: Paul Bucholtz, MDNRE
Richard Gay, Weyerhaeuser
Jamie McCarthy, KRWC

U.S. EPA Comments on the Quality Management Plan prepared by AMEC Environment & Infrastructure, Inc. for the Allied Paper, Inc./Portage Creek/Kalamazoo River Site

1. **Introduction, Section 1.**
   a. QMP is a formal document or manual, usually prepared once for an organization, which describes the quality system in terms of the organizational structure, functional responsibilities of management and staff, lines of authority, and required interfaces for those planning, implementing, and assessing all activities conducted. The QMP should not be prepared for any specific site.
   b. The latest American National Standard ANSI/ASQ E4-2004 should be referenced in Sections 1.1 and 2.0
2. **Management and Organization, Section 2.1.**
   a. The QMP should be signed and dated by all approval personnel.
   b. Organizational chart should identify all components of organization; identify position of QA manager, identify lines of reporting of the QA manager and identifies any other QA staff. EPA, MDEQ, Georgia-Pacific should not be part of the Figure 1.
3. **Quality System and Description, Section 2.2.**
   a. This section of the QMP should describe principal quality system components (e.g., quality system documentation, annual reviews and planning) applicable to by AMEC Environment & Infrastructure, Inc.
   b. Description of components should include how they are implemented and who of the management and staff is responsible for the implementation.
   c. This document should identify who is preparing, reviewing and approving QMP.
   d. The latest EPA Requirements for QAPPs (QA/R-5), EPA/240/B-01/003 Reissued May 2006 and the UFP-QAPP format should be referenced in this section of the QMP. The information for the UFP-QAPP can be found at **www.epa.gov/fedfac/documents/qualityassurance.htm**
4. **Procurement of Items and Services, Section 2.4.**
   The detail process for review and approval of suppliers quality related documentation (QAPPs, QMP) should be included in the QMP.
5. **Documents and Records, Section 2.5.**
   The QMP should describe process for preparing, reviewing, approving, issuing, using and revising documents and records.
6. **Computer Hardware and Software**
   a. The Computer Software and Hardware Control Section is missing from the submitted QMP
   b. The QMP should describe process for developing, installing, testing, using, maintaining, controlling, and documenting computer hardware and software.
   c. The process for ensuring that computer hardware used in environmental programs meets technical requirements and quality expectation should be described in QMP.
   d. The process for evaluating purchased hardware and software should be described. The roles, responsibilities and authorities of personnel responsible for the computer

hardware and software should be identified in the QMP.

7. **Planning, Section 2.6.**
   a. The detail process for developing, reviewing, approving, implementing, and revising QAPPs should be described in this section.
   b. EPA Requirements for QAPP (QA/R-5) and the UFP-QAPP format should be referenced in this section of the QMP.
   c. This section should describe the process for evaluating and qualifying data collected for other purposes or from other sources.
8. **Implementation of Work Processes, Section 2.7.**
   This section of QMP should describe process for preparation, review, approval, revision and withdrawal of Standard Operating Procedures (SOPs).
9. **Assessment and Response, Section 2.8 and Section 2.9.**
   Assessment and Response has two section numbers. The QMP is prepared the way that each section has one number and some subsection. Please be consistent during the document.
10. **Quality Improvement, Section 2.10**
    a. This section should describe the process for encouraging staff to establish communications between customers and suppliers, identify process improvement opportunities, and identify and propose solution for problems.
    b. It should be identified in the section, if the reanalysis of the samples are not possible due to holding time, the resampling will be performed.